



Notice of Service of Process

null / ALL
Transmittal Number: 19390879
Date Processed: 02/20/2019

Primary Contact: Anthony D. Coniglio
Liberty Mutual Insurance Company
175 Berkeley Street
Boston, MA 02116

Entity:	Liberty Mutual Insurance Company Entity ID Number 1765547
Entity Served:	Liberty Mutual Insurance Company
Title of Action:	Cody J. Stafford vs. Liberty Mutual Insurance Company
Document(s) Type:	Citation/Petition
Nature of Action:	Contract
Court/Agency:	Lafayette Parish District Court, LA
Case/Reference No:	20190659 E
Jurisdiction Served:	Louisiana
Date Served on CSC:	02/20/2019
Answer or Appearance Due:	15 Days
Originally Served On:	Secretary Of State
How Served:	Certified Mail
Sender Information:	Robert B. Brahan, Jr. 337-233-2323

Information contained on this transmittal form is for record keeping, notification and forwarding the attached document(s). It does not constitute a legal opinion. The recipient is responsible for interpreting the documents and taking appropriate action.

To avoid potential delay, please do not send your response to CSC

251 Little Falls Drive, Wilmington, Delaware 19808-1674 (888) 690-2882 | sop@cscglobal.com

**State of Louisiana
Secretary of State**

02/19/2019

Legal Services Section
P.O. Box 94125, Baton Rouge, LA 70804-9125
(225) 922-0415

LIBERTY MUTUAL INSURANCE COMPANY
C/O CORPORATION SERVICE COMPANY
501 LOUISIANA AVENUE
BATON ROUGE, LA 70802-5921

Suit No.: 20190659
15TH JUDICIAL DISTRICT COURT
LAFAYETTE PARISH

CODY J STAFFORD
vs
LIBERTY MUTUAL INSURANCE CO

Dear Sir/Madam:

I am enclosing a citation served in regard to the above entitled proceeding. If you are not the intended recipient of this document, please return it to the above address with a letter of explanation. All other questions regarding this document should be addressed to the attorney that filed this proceeding.

Yours very truly,

R. KYLE ARDOIN
Secretary of State

Served on: R. KYLE ARDOIN
Served by: E CUMMINS

Date: 02/18/2019
Title: DEPUTY SHERIFF

No: 1109060

JN





LAFPC.CV.54212931
cc_kmrachal

Ordered by Atty.: ROBERT B. BRAHAN, JR.

CITATION

CODY J STAFFORD
VS
LIBERTY MUTUAL INSURANCE CO

FIFTEENTH JUDICIAL DISTRICT COURT
DOCKET NUMBER: C-20190659 E
PARISH OF LAFAYETTE, LOUISIANA


STATE OF LOUISIANA

TO: LIBERTY MUTUAL INSURANCE COMPANY
THROUGH AGENT FOR SERVICE OF PROCESS
LOUISIANA SECRETARY OF STATE
8585 ARCHIVES AVE.
BATON ROUGE, LA 70809

SERVED ON
R. KYLE ARDOIN
FEB 18 2019
SECRETARY OF STATE
COMMERCIAL DIVISION

of the Parish of EAST BATON ROUGE

You are hereby cited to comply with the demand contained in the petition, a certified copy of which accompanies this citation, (exclusive of exhibits). You should file an answer or other pleading to said petition in the office of the Clerk of the FIFTEENTH JUDICIAL DISTRICT COURT, in the Lafayette Parish Courthouse, LAFAYETTE, Louisiana, within fifteen (15) days after the service hereof. Alternatively, your failure to comply herewith will subject you to the penalty of entry of default judgment against you. Witness the Honorable Judges of said Court, this FEBRUARY 1, 2019.


Deputy Clerk of Court
Lafayette Parish

*Additionally, you are hereby served with the following attached documents and ordered to comply with same:

CC: PETITION, PLAINTIFF’S FIRST SET OF INTERROGATORIES, AND FIRST REQUEST FOR ADMISSIONS

SHERIFF’S RETURN
LAFAYETTE PARISH SHERIFF

DATE SERVED: _____, 20____ TIME: _____
SERVED: _____
PERSONAL () _____
DOMICILIARY () ON _____
UNABLE TO LOCATE MOVED () NO SUCH ADDRESS ()
OTHER REASON: _____
RECEIVED TOO LATE FOR SERVICE ()
SERVICE OF WITHIN PAPERS
COSTS FEE \$ _____ MILEAGE \$ _____ TOTAL \$ _____
DEPUTY _____

CODY J. STAFFORD

*

15th JUDICIAL DISTRICT COURT

*

DOCKET NUMBER

20190659 E

VERSUS

*

PARISH OF LAFAYETTE

LIBERTY MUTUAL
INSURANCE COMPANY

*

STATE OF LOUISIANA

PETITION

NOW INTO COURT, through undersigned counsel, comes CODY J. STAFFORD ("Petitioner"), a domiciliary of the full age of majority of the Parish of Lafayette, State of Louisiana, who with respect represents:

1.

Made defendant herein is:

- A. LIBERTY MUTUAL INSURANCE COMPANY, a foreign insurer licensed to do and doing business within the State of Louisiana, which at all times relevant herein provided a policy of uninsured and/or underinsured motorist coverage to plaintiff, CODY J. STAFFORD, which policy provides insurance for the uninsured and/or underinsured portion of the damages alleged herein.

2.

On or about March 15, 2017, petitioner CODY STAFFORD was operating his 2013 Toyota Tacoma in a safe and prudent fashion, travelling northbound on Johnston Street, and at a complete stop at a red traffic signal, in Lafayette Parish, Louisiana, when, suddenly and without warning, a 2008 Chrysler 300 owned and operated by Cody S. Wunder slammed into the rear of Petitioner's vehicle, causing damages described herein.

3.

The above described collision resulted from the fault and/or negligence of Brent Alleman in the following non-exclusive particulars:

- A. In failing to maintain a proper lookout;
- B. In failing to remain attentive;
- C. In rear-ending the vehicle in front of him;
- D. In failing to stop in time;
- E. In failing to yield;
- F. In carelessly operating his vehicle; and
- G. In failing to see what he should have seen.

4.

As a result of the above described collision, Petitioner, CODY STAFFORD, sustained serious and permanent injuries that have resulted in past and future physical and mental pain and suffering, loss of enjoyment of life, past and future loss of earnings and loss of earning capacity that has necessitated that she incur medical expenses, both past and future, all of which entitles her to recover a sum reasonable in the premises, and for all equitable relief available under the law.

5.

Because Cody S. Wunder was underinsured for this loss, petitioner is entitled to recover his damages from defendant, LIBERTY MUTUAL INSURANCE COMPANY, under the above described contract of insurance.

6.

LIBERTY MUTUAL INSURANCE COMPANY has thus far failed to provide appropriate unconditional tender(s) in accordance with Louisiana law, said insurer is acting in bad faith and petitioner is entitled to recover statutory penalties, expenses of litigation, attorney fees and all of the benefits, statutory and contractual, to which he is entitled against said LIBERTY MUTUAL INSURANCE COMPANY, as well as damages for the failure to make adequate tender timely.

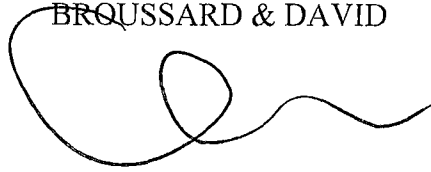
7.

At this time, the damages sustained by Petitioner totals more than \$50,000.00, exclusive of interest and costs.

WHEREFORE, Petitioner, CODY STAFFORD prays that a certified copy of this complaint be served upon defendant, LIBERTY MUTUAL INSURANCE COMPANY, and that after due proceedings are had there be judgment herein in favor of CODY STAFFORD and against defendant, LIBERTY MUTUAL INSURANCE COMPANY, in a sum reasonable in the premises together with interest from the date of judicial demand until paid, for all costs of these proceedings, and all other just and equitable relief as the nature and equity of the case may permit or require.

Respectfully submitted,


BROUSSARD & DAVID



Blake R. David (Bar No. 27427)
Robert B. Braham, Jr. (Bar No. 31390)
Post Office Box 3524
Lafayette, Louisiana 70502-3524
(337) 233-2323 - Telephone
(337) 233-2353 - Fax
ATTORNEYS FOR PLAINTIFF,
CODY J. STAFFORD

PLEASE SERVE:

LIBERTY MUTUAL INSURANCE COMPANY
Through Agent for Service of Process
Louisiana Secretary of State
8585 Archives Ave.
Baton Rouge, LA 70809

FILED THIS 31 DAY OF January, 2019
TRUE COPY ATTEST, LAFAYETTE, LA

Deputy Clerk of Court

CODY J. STAFFORD

* 15th JUDICIAL DISTRICT COURT

VERSUS

* DOCKET NUMBER 20190659 E

LIBERTY MUTUAL
INSURANCE COMPANY

* PARISH OF LAFAYETTE

* STATE OF LOUISIANA

**PLAINTIFF'S FIRST SET OF INTERROGATORIES AND
REQUESTS FOR PRODUCTION PROPOUNDED TO
LIBERTY MUTUAL INSURANCE COMPANY**

TO: LIBERTY MUTUAL INSURANCE COMPANY
Through Agent for Service of Process
Louisiana Secretary of State
8585 Archives Ave.
Baton Rouge, LA 70809

PLEASE TAKE NOTICE that you are hereby notified and required to answer separately, fully, in writing and under oath, the Interrogatories set forth below and to serve your answers thereto on Plaintiff, CODY STAFFORD, through undersigned counsel, pursuant to the Louisiana Code of Civil Procedure. These interrogatories are deemed to be continuing in nature. In answering these interrogatories, please furnish such information as is available to you, not merely information you now have of your own personal knowledge or merely within the knowledge of the party answering these interrogatories on your behalf. In other words, please furnish information that is in the possession of any of your agents, employees, officers, servants or any other persons acting on your behalf, or information which is otherwise subject to your custody or control.

DEFINITIONS AND INSTRUCTIONS

TAKE NOTE that the following definitions apply to your answers to these interrogatories:

- A. The term “**plaintiff**” means CODY STAFFORD
- B. The terms “**defendants**” and “**LIBERTY MUTUAL**,” for purposes of these interrogatories, mean any division or subdivision of Liberty Mutual Insurance Company, including any of its or their affiliates, subsidiaries, agents, employees, officers, servants or others subject to its custody or control, including experts, accountants, attorneys and financial advisors/consultants.
- C. “**Documents**” means any printed, typewritten or handwritten instrument of whatever character or the physical expression of any means of storage of information and includes, without limitation, any correspondence, memorandum, memoranda, internal correspondence, internal memorandum, internal memoranda, interoffice memoranda, interoffice memorandum, interoffice communications, e-mails, faxes, minutes of any meeting, contracts, agreement, letter, hand or typewritten note, transcripts, reports, computer printout, computer generated notes, computer tape, computer disc, microfilm, microfiche, tape recording, photograph, motion picture, plat, diagram, packaging, envelopes, return receipts, bills, invoices, charges,

monthly statements, checks, diaries, calendars, survey, voice tapes, recordings, other items of a similar nature, originals, and non-identical copies, and where original and/or non-identical copies are available, a copy of the original and a copy of all non-identical copies.

- D. The term “**recording**” includes the original, if available, or, if not, any copy, reproduction or facsimile of any electronic, stenographic, taped or recorded (audio or video) of anything whatsoever;
- E. The term “**fact**” or “**facts**” shall include any occurrence, event, action, communication, meeting, transaction, conduct or matter from which you formed your opinion or decided upon your course of action;
- F. Whenever you are asked to identify a document, photograph, video, fact, recording, entity or person, you must provide the following information:
 - A. With respect to tangible objects (i.e. dates or things), its date, location at the time of your answers, its preparer, name and address of its present custodian, and a summary of its contents.
 - B. With respect to a fact, the date, location and persons participating, present or involved, the substance of what transpired or what was communicated between and among such persons, and any documents reflecting, referring or pertaining in any way thereto.
 - C. With respect to a person, his or her present name, business and residential address, business and residential telephone numbers, employer and any past, present or future relationship with any party to this dispute.
 - D. With respect to an entity, its full name, legal form (i.e. sole proprietorship, limited liability company, partnership, corporation, etc.), its business address, any trade names or names under which it does business, and past, present or future relationship to any party to this dispute.
 - E. The terms “**communication**” or “**communications**” means any written or oral transcriptions of any nature between one or more persons, whether acting on their own or others behalf, and shall include the date of the communication, parties taking part, general subject matter, and whether or not such was immortalized (i.e. recorded, transcribed, scanned, etc.)
- G. **Objection or Claim of Privilege:** If you object to any portion of or an entire interrogatory herein, you shall (1) answer those portions not objected to; (2) state your lawful grounds for objection; and (3) state between whom the allegedly privileged communication took place, the date and whether or not such information is available for inspection by the Court.

INTERROGATORY NO. 1:

As to each separate Request for Admissions propounded contemporaneously herewith that you have not admitted, please state all bases for denial and the names and addresses of any witnesses who would in any way support the denial of same and/or identify specifically and in detail all documents that would support your denial.

INTERROGATORY NO. 2

Please state the full name and address, giving street number, city, state, and telephone number of every person from whom you or anyone acting on your behalf has obtained a written or recorded statement concerning any matter at issue in this lawsuit, and please indicate the date on which each such statement was obtained, the name, address, and employer of the person taking the statement, and identify all persons having copies of each such statement.

INTERROGATORY NO. 3:

Please state each person, claims representative, claims adjuster, supervisor, etc. who has handled and/or adjusted Petitioner's claim. With respect to each such person, please state their full name; residential and business address; employer and job title; time period during which they handled and/or adjusted Petitioner's claim; whether this person is still employed with you and, if not, the reason for their departure.

INTERROGATORY NO. 4:

Please state each person, claims representative, claims adjuster, supervisor, etc. who took part in any phase of the decision-making process whatsoever to settle Petitioner's claim. With respect to each such person, please state their full name; residential and business address; employer and job title; time period during which they handled and/or adjusted Petitioner's claim; whether this person is still employed with you and, if not, the reason for their departure.

INTERROGATORY NO. 5:

State with specificity and describe in detail each and every exhibit that will be used by you in the trial of this matter, including but not limited to the physical description of the exhibit; the date prepared, the name, address, and telephone number of the person(s) or entity who presently has control and/or custody of such exhibit; and the substance of what such exhibit represents.

INTERROGATORY NO. 6:

State the names, addresses, telephone numbers and employers of all persons whom you may call as lay witnesses in the trial of this case, and state the substance of the testimony of each such witness.

INTERROGATORY NO. 7:

Please identify specifically and in detail any impeachment evidence that you will seek to introduce at the trial of this matter.

INTERROGATORY NO. 8:

State the name of each person whom you expect to call as an expert witness at the trial of this action. As to each expert witness, state the subject matter upon which the expert will testify; a summary of the facts and opinions to which the expert is expected to testify, and a summary of each opinion; any journals, treatises, or other publications such expert has relied upon in the formation of any opinion pertaining to this claim; and, if the expert has submitted a written report concerning the aforesaid subject matter, identify such report, as well as the person or persons having possession of a copy of such written report.

INTERROGATORY NO. 9:

Please identify each and every basis for Liberty Mutual's denial of payment of its policy limits in this case for the occurrence that is the basis of this lawsuit. With regard to each basis, please provide all specific facts which you contend form the basis for Liberty Mutual's position, the name and address of each person known to you or reasonably believed by you to possess information that would substantiate Liberty Mutual's position, the name and address of any expert witness consulted by you, your attorney or representative whose testimony could substantiate Liberty Mutual's position, and identity, contents and custodian of each document, diagram, record, memorandum or other writing known to you or reasonably believed by you to contain information which would substantiate Liberty Mutual's position.

INTERROGATORY NO. 10

Please detail in specificity with particular numbers Liberty Mutual's quantum evaluation of the damages in this matter (CODY STAFFORD's Past mental and physical pain and suffering, Future physical pain and suffering, Past & Future Impairment of Bodily Functions & Disability, Past & Future Loss of Enjoyment of Life, Past Medical Expenses, Future Medical Expenses, Past Lost Wages, and Future Lost Earnings/Earning Capacity.) You have seen plaintiffs' evaluation, so please list specific numbers for each category of plaintiff's damages.

INTERROGATORY NO. 11

With regard to the above quantum evaluation, please provide all specific facts (rather than general allegations) which you contend form the basis for this evaluation, the name and address of each person known to you or reasonably believed by you to possess information that would substantiate these allegations, the name and address of any expert witness consulted by you, your attorney or representative whose testimony could substantiate these allegations, and identity, contents

and custodian of each document, diagram, record, memorandum or other writing known to you or reasonably believed by you to contain information which would substantiate these allegations.

REQUESTS FOR PRODUCTION

REQUEST NO. 1:

The original and/or copy of the entire claims file (inside and out, front and back) that was maintained by you in connection with Petitioner's claim. This request should include all **documents** of any kind and nature as defined in the "Definitions and Instructions" section above.

REQUEST NO. 2:

The original and/or copy of the entire claims file (inside and out, front and back) that was maintained by any other adjuster, representative, employee, agent or claim handler in connection with Petitioner's claim. This request should include all **documents** of any kind and nature as defined in the "Definitions and Instructions" section above.

REQUEST NO. 3:

All written, typed or mechanically recorded statements taken by you pertaining to the occurrence.

REQUEST NO. 4:

All written, typed, or mechanically recorded statements made by any person pertaining to the occurrence.

REQUEST NO. 5:

All reports, notes, diagrams, documents, journals, treatises, or other publications relied upon in the formation of any opinion pertaining to this claim.

REQUEST NO. 6:

A print out or screen shot of all electronic forms purportedly executed by Cody Stafford relative to Liberty Mutual Policy Number AOF-298-112676-40 7 8.

REQUEST NO. 7:

All correspondence between Liberty Mutual and Cody Stafford.

REQUEST NO. 8:

All documents in your possession purported to be signed by Cody Stafford.

REQUEST NO. 9:

All reports, notes, diagrams, documents, journals, treatises, or other publications relied upon in the formation of any opinion pertaining to this claim by any expert retained by you in this matter.

REQUEST NO. 10:

The most recent resume' or curriculum vitae of all experts consulted by you.

REQUEST NO. 11:

All exhibits identified in your responses to the Interrogatories propounded contemporaneously herewith. This includes the production of all exhibits you intend to introduce or use at trial.

REQUEST NO. 12:

Any and all impeachment evidence that you intend to introduce at the trial of this matter.

REQUEST NO. 13:

Any and all expert witness reports rendered in connection with any matter at issue in this litigation.

REQUEST NO. 14:

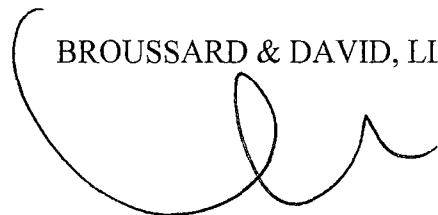
All documents referred to, referenced, or otherwise relied upon in your Answers to Petitioners' Interrogatories and/or Requests for Admission filed contemporaneously herewith.

REQUEST NO. 15:

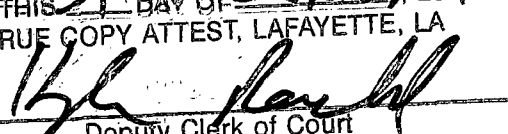
Please produce an entire legible copy of your file associated with Liberty Mutual Liberty Mutual Policy Number AOF-298-112676-40 7 8 with all documents, correspondence, office notes, payment schedules, fees paid, file activity and associated items and/or documents of any nature whatsoever with respect to Petitioner's claim.

Respectfully submitted,

BROUSSARD & DAVID, LLC



Blake R. David (Bar No. 27427)
Robert B. Brahan, Jr. (Bar No. 31390)
P. O. Box 3524
Lafayette, Louisiana 70502-3524
(337) 233-2323 - Telephone
(337) 233-2353 - Fax
ATTORNEYS FOR PLAINTIFF,
CODY STAFFORD

FILED THIS 31 DAY OF January, 2019
TRUE COPY ATTEST, LAFAYETTE, LA

Deputy Clerk of Court

CODY J. STAFFORD

*

15th JUDICIAL DISTRICT COURT

*

DOCKET NUMBER 20190659E

VERSUS

*

PARISH OF LAFAYETTE

LIBERTY MUTUAL

*

STATE OF LOUISIANA

INSURANCE COMPANY

FIRST REQUEST FOR ADMISSIONS

TO: LIBERTY MUTUAL INSURANCE COMPANY

Through Agent for Service of Process

Louisiana Secretary of State

8585 Archives Ave.

Baton Rouge, LA 70809

PLEASE TAKE NOTICE that you are hereby notified and required to answer separately, fully, in writing and under oath the Requests for Admissions set forth below and to serve the answers thereto on CODY STAFFORD through their undersigned counsel, within fifteen (15) days after service, pursuant to the Louisiana Code of Civil Procedure.

DEFINITIONS AND INSTRUCTIONS

- A. **“You” or “your”** shall refer to Liberty Mutual Insurance Company, or any person acting on behalf thereof.
- B. **“Document”** means any printed, typewritten or handwritten instrument of whatever character or the physical expression of any means of storage of information and includes, without limitation, any correspondence, memorandum, agreement, letter, hand or typewritten note, computer printout, computer tape, computer disc, microfilm, microfiche, tape recording, photograph, motion picture, plat, diagram, survey, voice tapes, recordings, other items of a similar nature, originals, and non-identical copies, and where original and/or non-identical copies are available, a copy of the original and a copy of all non-identical copies.
- C. **“Identify” or “identity”** means the following unless additional information is requested in a given request for admission:
 - 1. With respect to a natural person, the person’s full name, present employer, title, job description, business and home address and telephone numbers, and his relationship with the adverse party;
 - 2. With respect to a person other than a natural person, including any business entity, identify means to include its name, its address (all business addresses) and its date and place of formation, the type of legal entity that it is, and its chief executive officer;
 - 3. Identification of **“instance of occurrence”** means each event referred to in the Interrogatory, including, without limitation, an explanation or description of the event, the date on which the event occurred, and witnesses to the

event, the persons involved in the event, whether their involvement deals with causation, participation, bystander, or affected by the event, and the location or place of the event. If an event occurs more than once, each event is to be considered and identified as a separate “instance or occurrence”.

4. With respect to a “**document**”, identify means to state its title, date, author, addressee, recipient, subject matter or general nature, present location and custodian. Such documents should be identified whether or not such documents are in the possession of any of the parties to this litigation or their attorneys and whether or not the document is claimed to be privileged.
 5. With respect to “**oral statements**” or “**communications**”, identification means to state the maker, recipient, when made, where made, the person present when the communication was made, the mode of communication and the subject matter and date of the communication.
 6. With respect to an identification of “**demands**” made by plaintiff on defendant or defendants, you should include any document and/or communication by you and if oral, whether by telephone or a personal conference, wherein you sought information related to the causes of action asserted in the suit.
- D. “**Communications**” is a transmission from one person to another or in the presence of another, whether written, oral, telephonic, electronic or by any other means.
 - E. “**Person**” means the plural as well as the singular and includes without limitation, any natural person as well as any firm, corporation, unincorporated association, partnership or other form of legal entity unless the context clearly indicates otherwise.
 - F. With regard to documents for which you claim a privilege, please state the type of privilege claimed and its basis. In lieu of identifying any document, a copy thereof may be provided.
 - G. If the answer to any Interrogatory is not made from the personal knowledge of the person answering, identify each person from whom or each document from which information was obtained to make the particular answer and identify each person having knowledge of such information.
 - H. With regard to the production of documents that may be requested herein, “**produce**” or “**provide**” shall mean if you will do so without a Motion to Produce; if there are documents that you refuse to provide, identify those documents in responding to this request and give the reasons for your refusal.
 - I. “**Occurrence**” means the events leading to the damage described in Plaintiff’s Petition.
 - J. The responses to requested shall be produced at the offices of **Broussard & David, 600 Jefferson St., Lafayette, Louisiana 70501** within the required time.

REQUEST FOR ADMISSION NO. 1:

Please admit that on March 15, 2017, Cody Stafford was operating a 2013 Toyota Tacoma that was insured by Liberty Mutual Insurance Company bearing policy number AOF298112676407B.

REQUEST FOR ADMISSION NO. 2:

Please admit that Cody Wunder was solely at fault for the accident on March 15, 2017.

REQUEST FOR ADMISSION NO. 3:

Please admit that the policy issued by Liberty Mutual Insurance Company bearing policy number AOF-298-112676-40 7 8 maintained liability coverage with policy limits of \$500,000 per person /\$500,000 per accident.

REQUEST FOR ADMISSION NO. 4:

Please admit that the policy issued by Liberty Mutual Insurance Company bearing policy number AOF-298-112676-40 7 8 provided coverage to Cody Stafford on March 15, 2017.

REQUEST FOR ADMISSION NO. 5:

Please admit that the document attached hereto as Exhibit "A" is the UM Selection form associated with Liberty Mutual Insurance Company Policy Number AOF-298-112676-40 7 8.

REQUEST FOR ADMISSION NO. 6:

Please admit that the document attached hereto as Exhibit "A" is the only UM Selection form associated with Liberty Mutual Insurance Company Policy Number AOF-298-112676-40 7 8.

REQUEST FOR ADMISSION NO. 7:

Please admit that on or before November, 2018, Liberty Mutual received a Life Care Plan reflecting plaintiff's future medical care dated October 22, 2018.

REQUEST FOR ADMISSION NO. 8:

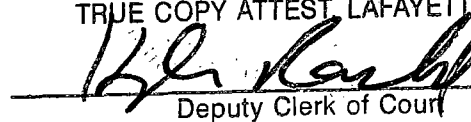
Please admit that Liberty Mutual has made no unconditional tender since its receipt of the Life Care Plan dated October 22, 2018.

Respectfully submitted,

BROUSSARD & DAVID, L.L.C.

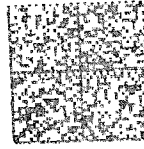


BLAKE R. DAVID (No. 27427)
ROBERT B. BRAHAN, JR. (No. 31390)
600 Jefferson Street
Chase Tower - Suite 700
Post Office Box 3524
Lafayette, Louisiana 70502-3524
(337) 233-2323 - Telephone
(337) 233-2353 - Fax
ATTORNEY FOR PLAINTIFF,
CODY STAFFORD

FILED THIS 31 DAY OF January 2019
TRUE COPY ATTEST, LAFAYETTE, LA

Deputy Clerk of Court

R. KYLE ARDOIN
SECRETARY OF STATE
P.O. BOX 94125
BATON ROUGE, LA 70804-9125

FIRST CLASS

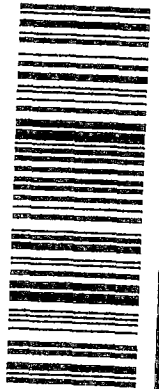


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Baton Rouge P&DC 708
19 FEB 2019 PM

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CERTIFIED MAIL[®]

SS151-A

7-1-204-201-9/01
Eric Simmons

BROUSSARD & DAVID



Blake R. David
A Professional Law Corporation
Board Certified-Civil Trial Advocacy
by National Board of Trial Advocacy

JUSTICE. OBTAINED.
Attorneys At Law
557 Jefferson Street
Post Office Box 3524
Lafayette, Louisiana 70502-3524

(337)233-2323 Telephone
(337)233-2353 Fax
(888) 337-2323 Toll Free

January 28, 2019

Clerk of Court, Lafayette Parish
P O Box 2009
Lafayette, LA 70502

New Suit
MC

DIV. "E"

CLERK OF COURT
LAFAJETTE PARISH, LA.
2019 JAN 31 PM 3:44

RE: Cody J. Stafford, et al v. GEICO, et al

20190659 E

Dear Clerk:

Please find enclosed the original and service copies of a Petition, Interrogatories and Request for Production of Documents for filing in the above captioned matter. Please serve all pleadings on the defendants indicated and notify me when service has been made. Please return the enclosed copy of this correspondence showing the docket number and date and time of filing. Also enclosed is our check in the amount of 350 to cover the cost of filing and service fees.

In accordance with LSA-C.C.P. Article 1572, you are requested to give us written notice by mail, ten days in advance, of the date fixed for the trial or hearing of this case, whether on exceptions, motions, rules or the merits. We also request immediate notice of all orders or judgments, whether interlocutory or final, made or entered in this case upon the rendition thereof as provided by LSA-C.C.P. Articles 1913 and 1914, including notice of judgment in the event this case is taken under advisement, or if the judgment is not signed at the conclusion of this trial.

With kind regards, I am

Yours truly,

INDEXED

Robert B. Brahan, Jr.

RBB/aa
Enclosures

STAMPED COPY GIVEN

MB



LAFPC.CV.54212931

cc_kmrachal

Ordered by Atty.: ROBERT B. BRAHAN, JR.

CITATION

CODY J STAFFORD
VS
LIBERTY MUTUAL INSURANCE CO

FIFTEENTH JUDICIAL DISTRICT COURT
DOCKET NUMBER: C-20190659 E
PARISH OF LAFAYETTE, LOUISIANA

STATE OF LOUISIANA

TO: LIBERTY MUTUAL INSURANCE COMPANY
THROUGH AGENT FOR SERVICE OF PROCESS
LOUISIANA SECRETARY OF STATE
8585 ARCHIVES AVE.
BATON ROUGE, LA 70809

of the Parish of EAST BATON ROUGE

You are hereby cited to comply with the demand contained in the petition, a certified copy of which accompanies this citation, (exclusive of exhibits). You should file an answer or other pleading to said petition in the office of the Clerk of the FIFTEENTH JUDICIAL DISTRICT COURT, in the Lafayette Parish Courthouse, LAFAYETTE, Louisiana, within fifteen (15) days after the service hereof. Alternatively, your failure to comply herewith will subject you to the penalty of entry of default judgment against you. Witness the Honorable Judges of said Court, this FEBRUARY 1, 2019.

[Signature]
Deputy Clerk of Court
Lafayette Parish

*Additionally, you are hereby served with the following attached documents and ordered to comply with same:

CC: PETITION, PLAINTIFF'S FIRST SET OF INTERROGATORIES, AND FIRST REQUEST FOR ADMISSIONS

SHERIFF'S RETURN
LAFAYETTE PARISH SHERIFF

DATE SERVED: _____, 20____
SERVED: _____
PERSONAL () _____
DOMICILIARY () ON _____
UNABLE TO LOCATE _____ MOVED () _____ NO SUCH ADDRESS _____
OTHER REASON: _____
RECEIVED TOO LATE FOR SERVICE () _____
SERVICE OF WITHIN PAPERS _____
COSTS FEE \$ _____ MILEAGE \$ _____ TOTAL \$ _____
DEPUTY _____

Time: _____
Office of the Secretary of State

MADE SERVICE ON THE NAMED PARTY THROUGH THE
OFFICE OF THE SECRETARY OF STATE

FEB 18 2019
BY: DYE CUMMINS #1155
Deputy Sheriff, Parish of East Baton Rouge, Louisiana

FEB 15 2019
Lafayette Parish Clerk of Court
Filed This Day

MAR 04 2019

[Signature]
Deputy Clerk of Court